

# **EXHIBIT 1**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, et al.,

*Plaintiffs,*

v.

PALESTINE LIBERATION ORGANIZATION,  
et al.,

*Defendants.*

Case No. 04 Civ. 397 (GBD)

**DECLARATION OF  
DAVID C. RUSSELL**

David C. Russell hereby declares as follows:

1. I am a member of the bar of this Court and am associated with the firm of Arnold & Porter Kaye Scholer LLP, counsel for Plaintiffs in *Sokolow v. PLO*. I make this declaration to place certain facts before the Court.
2. As of the Fall of 2018, Defendant's Washington, D.C. office website listed Saad Malley as one of several U.S. based notaries on its consular-service webpage.
3. On February 18, 2020, I spoke with Mr. Malley and asked him to certify a document for use with the Palestinian government. In response, he asked me to email him the document before he could give me an answer regarding certification, which I did that day.
4. On February 19, 2020, Mr. Malley called me. He asked if I could obtain an apostille for the document. He explained that, once I obtained an apostille, he would mail it out to (1) confirm that it could be certified and (2) if it could, to actually certify it.
5. On March 2, 2020, after obtaining an apostille, I mailed the document to Mr. Malley.

6. On March 11, 2020, I spoke by telephone with Mr. Malley. He told me that he had received the certificate and had mailed it to the Palestinian Foreign Ministry.

7. On March 12, 2020, I spoke again by telephone with Mr. Malley. He told me that the Palestinian Foreign Ministry had denied his request to certify the document.

8. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
May 25, 2022



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David C. Russell